

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Roanoke Division**

ISAW WALEED BLAKE, # 1106405,

Plaintiff,

v.

Case No. 7:23-cv-00381

T. JOSEPH, et al.

Defendants.

**DEFENDANT'S RESPONSE TO PLAINTIFF'S
FIRST REQUEST FOR ADMISSIONS**

COMES NOW Defendant, by counsel, and responds to Plaintiff's Request for Admissions

as follows:

REQUEST NO. 1. Defendant H.E. Johnson, admit that on 9/13/2022 in the approximate timeline of 8:23am until 1:40pm that you did not personally witness the incident at issue which allegedly took place at (PSCC) Pocahontas State Correctional Center in B2 Pod Cell 229.

OBJECTION: Admit.

RESPONSE:

REQUEST NO. 2. Defendant J. Wagner, Admit that you reviewed the camera footage of the incident at issue dated on 9/13/2022.

OBJECTION: This request for admission is vague in that Plaintiff fails to state which video footage he is referencing.

RESPONSE: Without waiving the objection, Defendant Wagner admits that he reviewed some footage regarding the 9/13/22 incident.

REQUEST NO. 3. Admit that the Plaintiff was not transported to the ER., Ms. Tikki Hicks.

OBJECTION: Plaintiff's request is vague, in that it does not state any dates, times, or incidents.

RESPONSE: Without waiving the objection, Defendant Hicks admits that Plaintiff was not transported to an ER after the 9/13/22 incident.

REQUEST NO. 4. Admit that VADOC policy and procedure requires of prison officials to file incident reports and use of force reports in assault cases whether it's inmate on officer or officer on inmate., H.E. Johnson.

OBJECTION: Plaintiff's request is vague as he does not address any specific policies, noting that there are certain requirements for certain situations.

RESPONSE: Without waiving this objection, Defendant Johnson admits that incident reports were drafted and filed regarding the 9/13/22 incident involving Plaintiff.

REQUEST NO. 5. Admit that incident reports and use of force reports exist in this case., H.E. Johnson.

OBJECTION:

RESPONSE: Admit.

Respectfully submitted,

By: s/ Andrew R. Page
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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of May 2024, I electronically filed the foregoing
Response using the CM/ECF system which will send notification of such filing to the following:
N/A

And I hereby certify that I have mailed by United States Postal Service the document to the
following non-CM/ECF participant:

VADOC Centralized Mail Distribution Center
Isaw Waleed Blake, #1106405
3521 Woods Way
State Farm, Virginia 23160

s/ Andrew R. Page
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